REDACTED VERSION

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November 28, 2005

TODD D. DAUBERT

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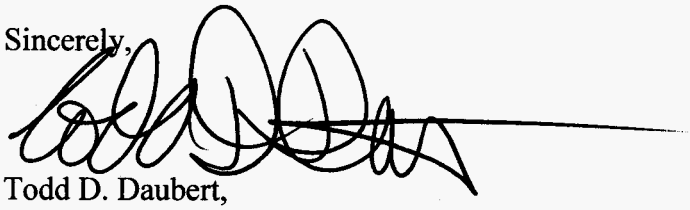
Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: WC Dockets Nos. 05-196 and 04-36
Compliance Letter

Dear Ms. Dortch:

USA Datanet Corporation ("USA Datanet"), by its attorneys, hereby respectfully files the attached "Compliance Letter" in accordance with the requirements set forth in the Federal Communication Commission's Public Notice, *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, DA 05-2945 (rel. November 7, 2005). Please feel free to contact the undersigned if you have any questions or need additional information.

Sincerely,



Todd D. Daubert,
Counsel for USA Datanet Corporation

Attachment

DC01/SMITD/241118.7

REDACTED VERSION

USA Datanet Corporation
Interconnected VoIP 911 Compliance Letter
WC Dockets 04-36 and 05-196

USA Datanet Corporation ("USA Datanet") submits the following 911 Compliance Letter ("Compliance Letter"), which contains all of the information described in the Federal Communications Commission's ("Commission" or "FCC") Public Notice, *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, DA 05-2945 (rel. November 7, 2005) ("Public Notice").

USA Datanet's 911 Solution

USA Datanet has undertaken all feasible steps to ensure that it will be able to provide 911 and enhanced 911 ("E911") service to all of its customers as soon as possible.[1] USA Datanet was an early "first adopter" of IP technology and a pioneer in the deployment of many different IP-based services, including voice applications. USA Datanet installed the nation's first SONUS network so that it could provide high quality and reliable IP-based services, including voice applications, to its customers. USA Datanet chose to build its IP-based data network from the ground up rather than modify an existing network optimized for circuit-switched services, because USA Datanet seeks to offer its customers the full range of benefits that IP-based services can make available.

Since USA Datanet's network was built from the ground up as an IP-based data network, USA Datanet's network has never been connected to the circuit-switched 911 network the way that the networks of providers of IP-enabled services that merely adapted their circuit-switched networks to provide IP-enabled services are connected. Long before the FCC adopted its *VoIP 911 Order*,[2] USA Datanet relied upon the services of Intrado to provide 911 services to its subscribers. Unfortunately, the manner in which Intrado provided 911 services did not meet all of the requirements of the FCC's *VoIP 911 Order*. Fortunately, however, Intrado initially believed that it would be able to provide compliant E911 coverage in USA Datanet's service area by the November 28, 2005 deadline.

As a small service provider with a network that was built from the ground-up to support IP-enabled services rather than adapted from a circuit-switched network with pre-existing 911 connectivity, USA Datanet was forced to rely on third-party 911 service providers to meet the FCC's November 28, 2005 deadline. Since USA Datanet had a preexisting relationship with Intrado, and Intrado initially believed that it would be able to offer compliant E911 coverage in USA Datanet's service area by the November 28, 2005 deadline, USA Datanet made the decision to rely on the services of Intrado to offer compliant E911 services by the November 28, 2005 deadline.

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1 911 services are available in some of USA Datanet's service areas but E911 services are not available in any of its service areas.

2 *In re: IP-Enabled Services; E911 Requirements for IP-Enabled Service Providers*, 20 FCC Rcd 10245 (2005) ("VoIP 911 Order").

Intrado subsequently informed USA Datanet that, contrary to Intrado's initial intentions, Intrado would not be able to offer compliant E911 service in USA Datanet's service area until after November 28, 2005. USA Datanet has aggressively researched and pursued third party service providers but has been unable to identify any providers currently providing 911 services in all of USA Datanet's service areas or E911 services in any of those service areas. Consequently, at the current time, USA Datanet is not able to provide 911 or E911 service to all of its customers in compliance with the rules established in the Commission's *VoIP 911 Order*. USA Datanet intends to provide 911 and E911 services to all of its customers as soon as a third party provider begins providing the necessary services in USA Datanet's service areas.

911 Routing Information/Connectivity to Wireline E911 Network

USA Datanet does not currently provide 911 or E911 services in all of its service areas and consequently does not transmit "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized."[3] At this time, USA Datanet's All Talk service is not interconnected, either directly or indirectly, to any Selective Routers since USA Datanet's third-party 911 service provider does not offer compliant 911 services in USA Datanet's service area.

As mentioned above, USA Datanet has not been able to identify a third party service provider offering E911 service in USA Datanet's service areas. Beginning in May 2005, USA Datanet communicated with representatives from Intrado to determine if Intrado could provide E911 services to USA Datanet's customers. Intrado told USA Datanet that, pursuant to Intrado's intended service area rollout schedule, Intrado would be able to provide USA Datanet with compliant E911 services in USA Datanet's core service areas, and that Intrado would inform USA Datanet immediately if Intrado became aware of any facts that might negatively impact Intrado's service rollout schedule for USA Datanet's service area.

In August 2005, Intrado informed USA Datanet that its rollout schedule had changed, but did not provide USA Datanet with a final service area rollout schedule. At that time, USA Datanet aggressively began to research and pursue alternative third party service providers capable of providing the required E911 services. Of the six third party 911 service providers USA Datanet contacted, none were able and willing to provide compliant 911 services to USA Datanet:

- two are resellers of Intrado's services;[4]

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[3] *Public Notice, Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, DA 05-2945 at 3 (rel. Nov. 7, 2005) ("Public Notice").

[4] **[BEGIN REDACTED]** **[END REDACTED]**

- one currently is not ready to begin providing compliant 911 services in USA Datanet's service area;[5]

- one, which covers only a portion of USA Datanet's service area at a much higher price than that offered by Intrado, has informed USA Datanet that it is not accepting any new customers;[6]

- one has been unacceptably slow in responding to USA Datanet's repeated requests for service, which brings into question the ability and willingness of the provider to offer compliant 911 services;[7] and

- the last provides only transport service for 911 calls.[8]

Intrado remains USA Datanet's first choice to provide 911 and E911 services to its customers. To the extent USA Datanet is able, in the future, to secure 911 and E911 services from Intrado, USA Datanet would be able to offer its customers access to 911 and E911 services provided via the Wireline E911 Network.[9] Intrado recently provided USA Datanet with an FCC Reporting Packet which contains information describing how Intrado's services would enable USA Datanet to comply with the Commission's *911 VoIP Order*. The FCC Reporting Packet is attached hereto as *Attachment B* and the service information is presented and organized in the same order as requested in the Commission's Public notice.

Transmission of ANI and Registered Location Information

USA Datanet does not currently provide E911 service to its customers and as a result is not "transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information."[10] As discussed above, USA Datanet is working with Intrado to implement compliant E911 services. Moreover, USA Datanet is actively trying to find any other third party provider capable of providing E911 services in USA Datanet's service area in the event that Intrado is unable or unwilling to provide compliant 911 services in USA Datanet's service area on a timely basis. Once USA Datanet is able to secure E911 services from a third party service provider, it will transmit the required automatic numbering and registered location information for its customers. In the meantime, USA Datanet is not marketing or selling its interconnected VoIP services to new customers.

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5 **[BEGIN REDACTED]** **[END REDACTED]**

6 **[BEGIN REDACTED]** **[END REDACTED]**

7 **[BEGIN REDACTED]** **[END REDACTED]**

8 **[BEGIN REDACTED]** **[END REDACTED]**

9 USA Datanet remains open to receiving E911 services from third-party 911 service providers to the extent that Intrado is unable or unwilling to provide compliant 911 services in USA Datanet's service area.

10 Public Notice at 2.

911 Coverage

As of November 28, 2005, USA Datanet has not been able to achieve full 911 compliance with the requirements of the *VoIP 911 Order* in its service area. USA Datanet intends to become fully compliant with the Commission's *VoIP 911 Order* as soon as it is able to obtain the necessary 911 and E911 services from a third party service provider. As mentioned above, USA Datanet is seeking to obtain 911 and E911 services from Intrado, however, Intrado is not currently offering service throughout USA Datanet's core service areas. Included in the attached Intrado FCC Reporting Packet is a map illustrating Intrado's planned rollout schedule, including anticipated rollout dates. Based on Intrado's rollout schedule, USA Datanet will be able to achieve full compliance with the Commission's *911 VoIP Order* requirements by no later than June 30, 2006. However, USA Datanet's timeframe for compliance may change if Intrado changes its service rollout schedule, or if USA Datanet is able to purchase compliant 911 services from an alternate third party 911 service provider.

Obtaining Initial Registered Location Information

USA Datanet has begun to obtain registered location information for each of its customers' in accordance with the Commission's VoIP 911 Order. On July 27 and 28, 2005, USA Datanet mailed to each new and existing customer, an E911 Advisory in which USA Datanet informed its customers that, among other things, customers must register their service address before attempting to use USA Datanet's service to contact 911 emergency services. Customers were told that they could not use their USA Datanet service for any purpose until they registered their service locations and that, if the customer provided an incorrect address, any calls to 911 would be routed to emergency personnel that did not service the location from which the customer called.

USA Datanet has made several attempts, in writing and by telephone, to contact those customers that did not respond to the first E911 Advisory. Specifically, USA Datanet sent letters on August 22, 2005 and September 6, 2005. Customers were also contacted by email on July 28, 2005, August 5, 2005, August 16, 2005, August 29, 2005, September 21, 2005 and September 27, 2005. In addition, beginning on August 22, 2005 and continuing to the present, USA Datanet has attempted to contact these customers by telephone.

In order to facilitate collection of its customers' registered service locations, USA Datanet provided a web interface by which customers can provide their registered location information to USA Datanet, and amended its sales procedures both via the Internet and call centers such that customers could not sign up for service until they have provided a registered service location. As a result of USA Datanet's extensive efforts to contact its customers, to date, USA Datanet has obtained the registered location of 88.3% of its customers. Customers can access USA Datanet's toll free number using the same equipment that the customer uses to access their interconnected VoIP service.

Obtaining Updated Registered Location Information

As discussed in detail above, USA Datanet distributed an E911 Advisory notifying its customers of the need to provide the Company with a registered service location. As part of that E911 Advisory , USA Datanet also advised its customers of the importance of providing updated registered location information whenever the customer changed its service address. Customers were informed that calls to 911 emergency services are routed based on the service address provided to USA Datanet and that calls would be sent to incorrect 911 emergency personnel if the customer failed to provide USA Datanet with the customer's updated service location information. USA Datanet provided a web interface by which customers can provide their registered location information to USA Datanet, and call center operators can update the registered location information at the request of customers. Customers can access USA Datanet's toll free number using the same equipment that the customer uses to access their interconnected VoIP service.

To the extent USA Datanet obtains 911 and E911 service from Intrado, customers will have an alternative method of updating their registered locations. The attached Intrado FCC Reporting Packet describes the methods Intrado offers for customers to update their registered locations.

Technical Solution for Nomadic Subscribers

Once USA Datanet is able to obtain 911 and E911 services for its customers from a third party 911 provider, USA Datanet will work with the provider to ensure that subscribers have access to 911 service whenever they use their service nomadically. To the extent USA Datanet obtains 911 and E911 services from Intrado, for example, USA Datanet's customers will be able to access 911 service even when using their VoIP services nomadically. A description of Intrado's technical solution for customers using their service nomadically is included in the attached Intrado FCC Reporting Packet.

ATTACHMENT A

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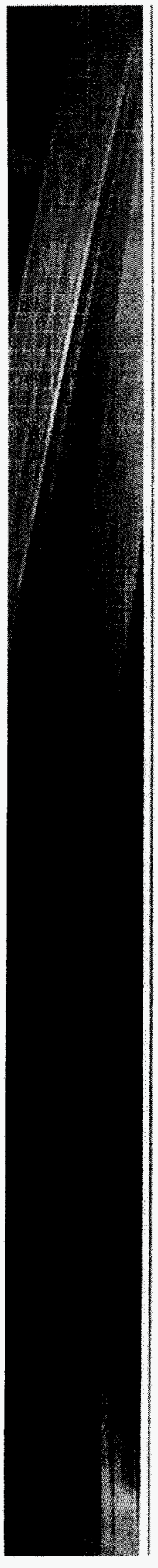
ATTACHMENT B



intrado

FCC Reporting Packet

November 21st, 2005

Overview:

In an effort to continue supporting our customers as they seek to adhere to the Federal Communications Commission's (FCC) reporting requirements, Intrado has prepared the following document that contains key reporting elements and deployment information as requested by the FCC in its Public Notice entitled, *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters, WC Docket No. 04-36, WC Docket No. 05-196,* released on November 7, 2005 (Public Notice).

The information set forth in this document is intended to supplement the Compliance Reports that VoIP Service Providers (VSPs) are required to file with the FCC by November 28, 2005. The format of the document is in alignment with the Public Notice, in order to facilitate an easier reporting transition for the VSPs. In addition, the actual filing procedures from the Public Notice are provided at the end of this document to further assist our customers.

We recommend that your own attorneys review the individual Compliance Reports prior to their submission to the FCC, as Intrado is supplying information based upon its own interpretation of the Public Notice. Relying strictly on this document will not guarantee compliance with the requirements outlined to VSPs in the Public Notice.

We are more than willing to answer any questions that your company may encounter and please direct them to your respective Account Manager.

**Note: Please view document in Print Layout and open maps using Adobe Acrobat.

Elements for Compliance Letters

911 Solution:

Public Notice Requires: [redacted]

The V9-1-1™ solution enabled by Intrado provides a true E9-1-1 solution for VoIP Service Providers. Intrado enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service for the VSP is also the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Intrado manages the VPC functionality and the Call delivery component on behalf of the VSP thereby enabling a full end to end solution from one service provider.

The only VSP customer requirements for delivery of the V9-1-1 service are the ongoing delivery of address and telephone number information to Intrado via a real-time interface and the connectivity to the Intrado network to enable live 9-1-1 call delivery.

- **911 Routing Information/Connectivity to Wireline E911 Network**:

  [redacted]

  Currently through the assistance of our Network providers, our VSP customers will have access to 154 E9-1-1 Selective Routers by November 28th, 2005 and the attached Major Market Deployment Map and the VoIP Deployment Plan reflects the major market deployment schedules. Note: the market deployment map represent major markets where Intrado has connectivity to at least 1 selective router, ALI steering and the ability to populate ALI.

- **Transmission of ANI and Registered Location Information**:

  [redacted]

[1] *VoIP 911 Order*, 20 FCC Rcd at 10269-70, ¶ 42 (footnote omitted).

information. This information should include: (i) a quantification, on a percentage basis, of how many answering points within the provider's service area are capable of receiving and processing ANI and Registered Location information that the provider transmits; (ii) a quantification of the number of subscribers, on a percentage basis, whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information; and (iii) if the provider is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.

- **Basic PSAP:** Currently 93% of the US population is served by PSAPs operating off an E9-1-1 Selective Router. To illustrate PSAPs within the US, which are not served by a Selective Router, the enclosed "Basic PSAP" map could be used as reference information. **While these areas are not included within the FCC Order and are not required for compliance,** Intrado is actively contacting these areas to determine technical options for VoIP E9-1-1 native call delivery. **Reporting this information is not required by the FCC.**
- **ANI Only:** There are unique deployment circumstances in areas of the US and Puerto Rico that operate off E9-1-1 Selective Routers, but will not meet the full FCC mandate. This information should be considered as part of the compliance report to the Commission. Intrado is currently aware of four (4) States and a Territory within your serving area that will have native Selective Routing functionality but will only provide Automatic Number Identification (ANI) only service to the PSAP. The following information explains the circumstances within these areas:

  New Jersey - In the State of New Jersey Intrado has gained permission from the State to deploy a voice only service which includes the call taker receiving ANI on the VoIP 911 caller. The State ALI system is not capable of full dynamic ALI updates and will require an upgrade. New Jersey represents 3% of the total US population.

  Ohio - To date, Ohio has not granted permission to Intrado to deploy a voice only solution. The State ALI system is not capable of full dynamic ALI update. Ohio represents 4% of the total US population.

  Hawaii - To date, Hawaii has not granted permission to Intrado to deploy a voice only solution. The ALI systems are not capable of full dynamic ALI update. Hawaii represents 5% of the total US population

  Puerto Rico - To date, Puerto Rico has not granted permission to Intrado to deploy a voice only solution. The ALI systems are not capable of full dynamic ALI update. Puerto Rico represents 3% of the total US population

- **VSP Specific Metrics:** Please see enclosed VSP coverage Spreadsheet.

- **911 Coverage**:

[redacted].

- **Deployment Overview** – Intrado, as your VPC is working on nationwide native VoIP E9-1-1 delivery in accordance with the Commission Order. The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on the VSP customer subscriber base priorities. The attached “Major Market Deployment Map”, which corresponds with MSAs, identifies regions within your territory that have connectivity to at least one Selective Router, ALI steering capabilities; ANI and the ability to populate ALI. These areas are planned for deployments by November 28, 2005; March 31, 2006 and June 30, 2006. This map could be used to demonstrate FCC compliance for the November 28th requirements and the future deployment strategy.

Obtaining Initial Registered Location Information:

[redacted].

This information should be completed by the VoIP Service Providers. As a component of the V9-1-1 Service the VSP has access to the Intrado Validation and Update Interface (VUI) which enables near real-time delivery of the VSP acquired or VSP User submitted address update information. VSPs may integrate VUI into their existing provisioning systems to ensure seamless delivery of acquired registered location information to the Intrado systems.

Obtaining Updated Registered Location Information:

[redacted]

The V9-1-1™ Mobility Services provides Intrado Customers with a real-time provisioning interface to provision/register subscriber (location) data to Intrado to ensure the proper address and call back number is delivered to the appropriate PSAP at the time of a VoIP 9-1-1 call. This interface is named the Validation and Update Interface (VUI). Intrado's real-time provisioning process enabled by VUI includes a geocoding process as well as management of Master Street Address Guide (MSAG) validation at the time of provisioning. Customers can utilize a VSP provided web portal or a VSP provided service center by phone to enable the near real-time update to Intrado.

At the time of the VoIP 9-1-1 call Intrado uses the VSP customer's provisioned information to associate the latitude and longitude assigned during provisioning with the wireline PSAP boundaries maintained by Intrado to determine appropriate PSAP for delivery of the MSAG Valid address and Call Back Number of the user.

Intrado also enables a VSP to utilize the Intrado Level of Service (LoS) query integrated into the VUI application. This functionality enables a real-time query to Intrado with an address of a customer/end user for the purpose of determining the level of E9-1-1 service available to that customer based on their location. Intrado will return a set of responses (Enhanced, Basic, etc.) that will enable the user to determine E9-1-1 service level and take appropriate action.

Technical Solution for Nomadic Subscribers:

[redacted]

VSPs utilizing Intrado's V9-1-1™ Mobility Services are able to route VoIP emergency calls from their VoIP network to the Intrado Network or alternative 3rd party network for delivery to the appropriate Selective Router and then on to the geographically appropriate Public Safety Answering Point (PSAP) via the native 9-1-1 infrastructure. The Services utilized provide a "native" 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers (TNs) to the most geographically appropriate PSAP. The V9-1-1 solution enables full support of nomadic usage of VoIP provided the user updates their address information upon arrival into a new location. Through the Validation and Update Interface (VUI) the V9-1-1 solution will enable the near real-time provisioning (Geocoding and MSAG Validation) of the newly provisioned address and make available (assuming no errors) that user's information for delivery to the PSAP within 15 minutes of receipt.

Intrado recognizes the need for removing the user interaction and self provisioning component of the solution. To that end, Intrado is actively working and trialing a number of location determination technologies, which will be supported by Intrado and the Intrado provisioning interface.

Filing Procedures

Interconnected VoIP providers must file the above-referenced Compliance Letters in this proceeding on or before November 28, 2005. All such filings must reference WC Docket No. 05-196 and should be labeled clearly on the first page as "Compliance Letter." Compliance Letters may be filed using: (1) the Commission's Electronic Comment Filing System (ECFS), or (2) by filing paper copies. *See* Electronic Filing of Documents in Rulemaking Proceedings, 63 Fed. Reg. 24,121 (May 1, 1998).

- Electronic Filers: Compliance Letters may be filed electronically using the Internet by accessing the ECFS: http://www.fcc.gov/cgb/ecfs/. Filers should follow the instructions provided on the website for submitting comments. For ECFS filers, in completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket number (WC Docket No. 05-196).

- Paper Filers: Parties who choose to file by paper must file an original and four copies of each filing. Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (although we continue to experience delays in receiving U.S. Postal Service mail). All filings must be addressed to the Commission's Secretary, Marlene H. Dortch, Office of the Secretary, Federal Communications Commission, 445 12th Street, SW, Washington, DC 20554.

- The Commission's contractor will receive hand-delivered or messenger-delivered paper filings for the Commission's Secretary at 236 Massachusetts Avenue, NE, Suite 110, Washington, DC 20002. The filing hours at this location are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of before entering the building.

- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.

- U.S. Postal Service first-class, Express, and Priority mail should be addressed to 445 12th Street, SW, Washington DC 20554.

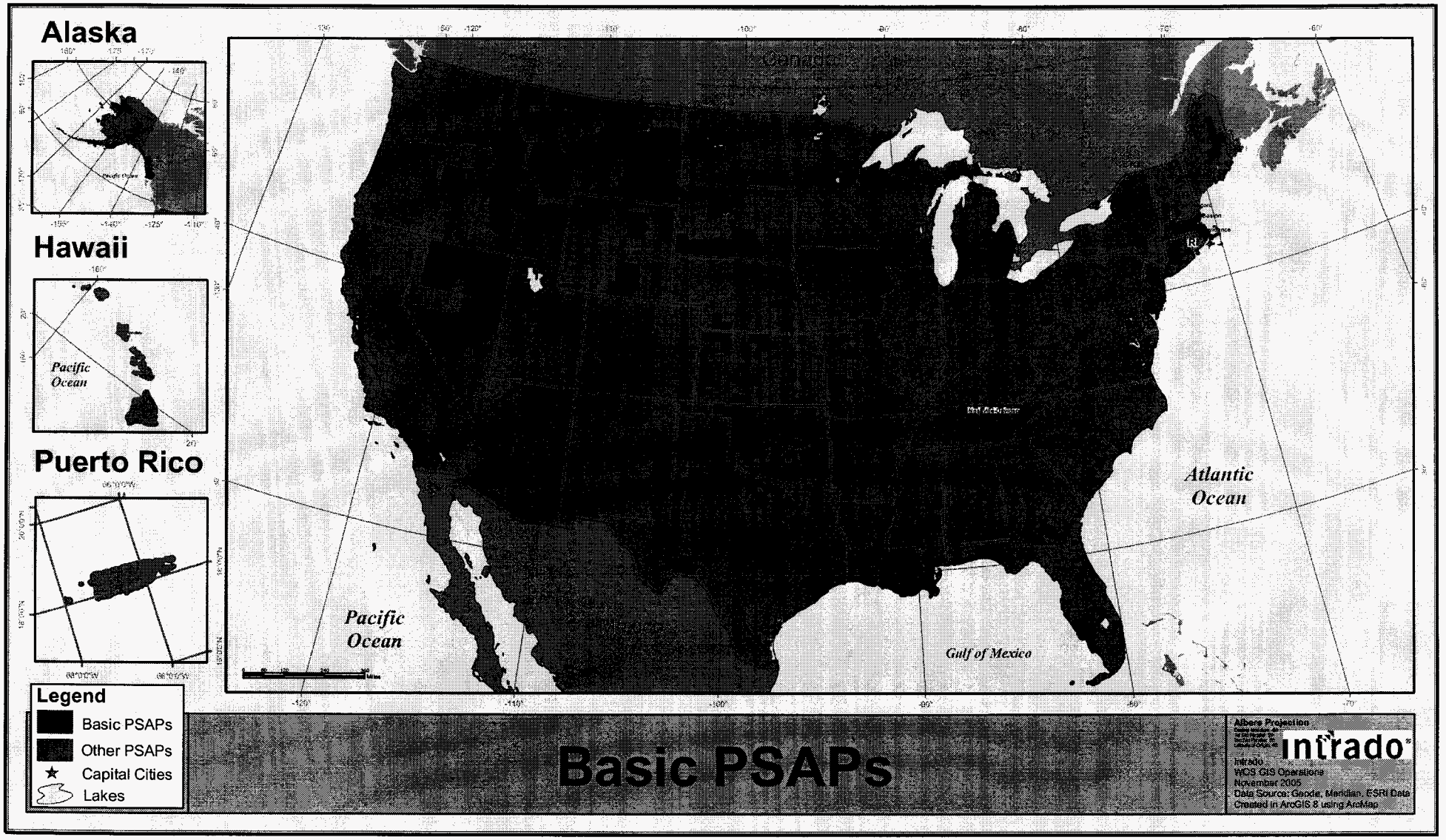
Parties should also send a copy of their filings to:

- Kathy Berthot, Deputy Chief, Spectrum Enforcement Division, Enforcement Bureau, Federal Communications Commission, Room 7-C802, 445 12th Street, SW, Washington, D.C. 20554, or by email to kathy.berthot@fcc.gov; and

- Janice Myles, Competition Policy Division, Wireline Competition Bureau, Federal Communications Commission, Room 5-C140, 445 12th Street, SW, Washington, D.C. 20554, or by e-mail to janice.myles@fcc.gov.

Parties must also serve one copy with the Commission's copy contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW, Room CY-B402, Washington, D.C. 20554, (202) 488-5300, or via e-mail to fcc@bcpiweb.com.

For further information regarding this notice, press should contact Janice Wise, Director, Media Relations, Enforcement Bureau, (202) 418-8165, and providers should contact Kathy Berthot, Deputy Chief, Spectrum Enforcement Division, Enforcement Bureau, (202) 418-7454.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Pacific Ocean
Puerto Rico
Canada
Atlantic Ocean
Pacific Ocean
Gulf of Mexico
Legend
Basic PSAPs
Other PSAPs
Capital Cities
Lakes
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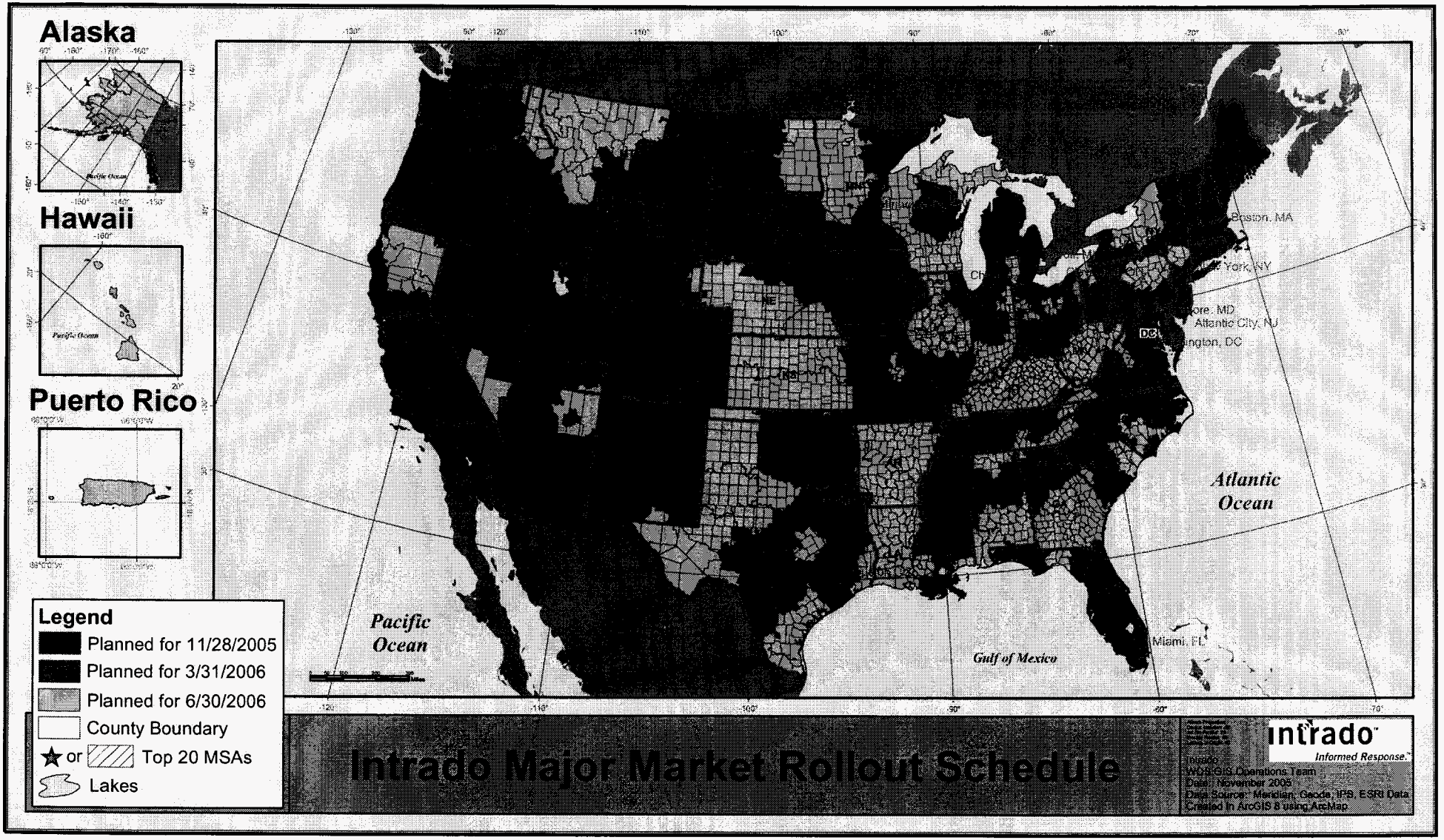
Albers Projection
Intrado
Intrado
WCS GIS Operations
November 2006
Data Source: Geodic, Meridian, ESRI Data
Created in ArcGIS 8 using ArcMap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Puerto Rico
Legend
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Planned for 3/31/2006
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County Boundary
or Top 20 MSAs
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Atlantic Ocean
Gulf of Mexico
Boston, MA
Miami, FL
Intrado Major Market Rollout Schedule
Intrado
Informed Response.
Intrado
WGS GIS Operations Team
Date: November 2005
Data Source: Meridian, Geode, IPS, ESRI Data
Created in ArcGIS 8 using ArcMap